



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

October 14, 2020

BY ECF AND EMAIL

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Mustapha Raji, 19 Cr. 870 (JMF)

Dear Judge Furman:

The Government and the defendant write jointly in response to the Court's direction that the parties submit a letter indicating our views on whether the proceeding scheduled for October 29, 2020 should be held. (*See* Dkt. Entry No. 44).

The parties request that the proceeding scheduled for October 29, 2020 be adjourned to a date in mid-January 2021. Due to the defendant's residence in Florida, and the defendant's ongoing medical issues—which have required some hospitalization—the defendant and defense counsel have not been able to adequately confer regarding a possible plea or motions.


Should the Court wish to hold a proceeding this month, the parties request a virtual pretrial conference, so that the defendant need not travel to New York and risk additional exposure to the coronavirus. The defendant waives his appearance at either an in-person proceeding or a virtual proceeding. The parties are available at the following dates and times: October 27th after 12:00 p.m.; October 28th after 3:30 p.m.; October 29th at any time; October 30th before 12:00 p.m. or after 3:00 p.m.

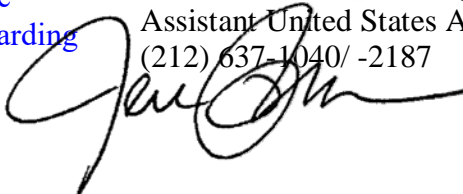
If the Court adjourns the pretrial conference to a date in mid-January 2021, the parties respectfully request that the Court exclude time under the Speedy Trial Act from October 29, 2020 to the next pretrial conference date, so that the defendant and his counsel have adequate time to confer regarding a possible pretrial disposition and/or possible motions.

The Court will hold a teleconference with the attorneys on October 27, 2020, at 2:15 p.m. To access the conference, counsel should call 888-363-4749 and use access code 5421540#. (Members of the press and public may call the same number, but will not be permitted to speak during the conference.) Counsel should be sure to consult the Court's Emergency Individual Rules and Practices, available on the Court's website, and comply with the rules regarding conferences. The Clerk of Court is directed to terminate Doc. #45. SO ORDERED.

Respectfully submitted,

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Assistant United States Attorneys
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October 16, 2020